

January 15, 2007

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California, Resources Agency, Department of Water Resources
P.O. Box 942836
1416 Ninth Street
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Subject: Salton Sea Restoration Draft Programmatic EIR Comments

Dear Dale Hoffman-Floerke,

The Salton Sea Authority (SSA) respectfully submits its comments regarding the Salton Sea Ecosystem Restoration Draft Programmatic Environmental Impact Report (Draft PEIR).

We believe the Draft PEIR, as currently written is inadequate on many levels including a flawed analysis of the SSA Plan and a failure to include new information, mitigation measures and essential elements of the SSA alternative that reduce environmental impacts to a level that is less significant than analyzed in the Draft. The SSA submittal and accompanying technical reports and comments demonstrate that the Draft PEIR is incomplete. The comments contained here in will complete the Draft PEIR and demonstrate that the locally developed Salton Sea Authority's Plan contains the key components that create the Preferred Alternative envisioned by Legislation; a Preferred Alternative that the Secretary can recommend to the Legislature which enjoys deep and widespread public support.

The augmented SSA Restoration Plan must be re-analyzed in leiu of the March 2006 incomplete draft that has been circulated as part of this EIR. We believe that analysis will demonstrate that the augmented SSA Plan should serve as the platform for the type of balanced and comprehensive vision required for this important effort.

The local plan includes elements and amendments added in response to public input, technical research, environmental community requests, DWR information and requests, and Technical Advisory Committee comments. It is the product of a 10-year collaborative process and has demonstrated wide-spread support of residents and local governments who live with the Salton Sea every day and will continue to do so in the future.

Of all the alternatives presented in the Draft PEIR, the SSA Plan as augumented by these comments maintains the greatest portion of the Salton Sea and preserves more fish and wildlife than any other proposal. Only the SSA Plan improves water quality before and after it enters the Sea and reduces odors to surrounding communities. It also provides a comprehensive improvement to air quality, thus reducing impacts and protecting public health. The local plan preserves the greatest amount of meaningful shoreline and provides the most recreational opportunities for California. Equally important, the Plan is supported by the Torres Martinez Tribe of Desert Cahuilla Indians because it provides the greatest benefit to cultural, spiritual, economic and environmental values essential to the Tribe.

While cost is an important factor for all alternatives under consideration, the SSA Plan would generate a tremendous upside in economic benefit to offset any cost. Studies by economists show that the SSA Plan would provide an annual non-direct economic benefit of \$1 billion to \$5 billion in addition to the estimated \$7 billion in increased tax revenues generated along with thousands of new jobs and associated ongoing economic benefits to the region and the state.

Importantly, the SSA Plan is the only alternative with a local funding component critical to its implementation. This is made possible by the support of local agencies and the generation of large-scale economic and recreational opportunities. This critical element must be considered in the development of a preferred alternative and makes the local plan a clear standout from a practical perspective.

There has been much done to understand the Sea and it's ecosystem over the last few decades, yet much work remains. The Authority has new research currently underway on water treatment approaches, aggregate supply, barrier locations and design, habitat approaches, and funding strategies. The Authority intends to remain a strong and active participant throughout the upcoming months, years and decades in the planning and implementation of Restoration Plan.

For these and other reasons detailed in the SSA full submittal, the SSA Plan should be further analyzed in the Draft PEIR and ultimately adopted as the environmentally superior alternative. SSA is committed to successfully restoring and preserving the splendor of the Salton Sea. We look forward to working with you to achieve that goal.

Respectfully,

Rick Daniels Executive Director Salton Sea Authority